

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
Administration of the ) CC Docket No. 92-237  
North American Numbering Plan ) Phases One and Two

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**COMMENTS OF SBC COMMUNICATIONS INC.**

SBC Communications Inc. (SBC), by its Attorneys and on behalf of its subsidiaries, including Southwestern Bell Telephone Company (SWBT), Southwestern Bell Mobile Systems (SBMS), and Southwestern Bell Communications Services, Inc. (SBCS), files these Comments in response to the Public Notice in which the Commission has requested further Comments on the duration of the transition period for expansion from three to four digit Carrier Identification Codes (CICs). SBC submits that the transition (or permissive) period should be ended no later than December 31, 1996.

I. **THE TRANSITION PERIOD FOR ACCESS CODE DIALING SHOULD BE ENDED.**

The Carrier Access Code (CAC) is a dialing sequence used by a customer to access a preferred Interexchange Carrier (IXC), when that IXC is not the preselected carrier for the service the customer is then using. The CAC for Feature Group D access, before expansion to four digit CICs, was in the format 10XXX<sup>1</sup>, in which XXX represented the

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<sup>1</sup> X = 0-9.

CIC. When the three digit CICs exhausted, four digit CICs in the 5XXX and 6XXX series were assigned, resulting in seven digit CACs in the form 101XXXX. New entrants were therefore assigned only seven digit CACs.

The transition (or permissive) period, which began April 1, 1995, allows the public to use either a five digit CAC or seven digit CAC to reach a carrier of choice--provided the carrier has been assigned a three-digit CIC.<sup>2</sup> If the carrier has been assigned only a four-digit CIC in the 5XXX and 6XXX ranges, then only that code may be used to access that carrier, and therefore a seven-digit CAC must be dialed.

The length of the transition period directly affects the quantity of CICs remaining in the 5XXX and 6XXX series. The transition plan to four-digit CICs requires a switch, when confronted with a dialed series of 1010, 1015, or 1016 in the CAC, to expect three additional digits. During this transition period, any other digit in the fourth position of this dialed sequence (101   ) notifies the switch to expect only one additional digit. Thus, by definition, the transition period must end when CICs in the 5XXX and 6XXX series are depleted. When that happens, there will no longer be a mechanism to distinguish a seven digit CAC from a five digit CAC. Until the transition period ends, however, CICs will essentially remain in two formats: a three-digit format (XXX) and a four-digit format (XXXX).

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<sup>2</sup> A customer, when using a carrier that has been assigned a three digit CIC, must dial 1010XXX when using the seven digit CAC format.

Section 251 of the Telecommunications Act of 1996 (the Act) requires local exchange carriers (LECs) to provide dialing parity. LECs cannot provide toll dialing parity, however, as long as there are differences in the length of the CAC for Feature Group D dialing.

## II. THE RESTRICTION ON CIC ASSIGNMENT SHOULD BE TERMINATED.

SBC believes that the transition period should be ended. Others have argued, and will continue to argue, that the transition period should continue. If the period should continue, then the supply of four digit CICs in the 5XXX and 6XXX ranges must be preserved for the duration of the period, because, as pointed out above, once the 5XXX and 6XXX CICs are depleted, the dual dialing system can no longer be utilized. The Public Notice to which these Comments are addressed expressed concern that "there has been an unexpected increase in the demand for CICs."<sup>3</sup> This becomes a problem only if the transition plan is to be prolonged. If the transition period is terminated, then exhaust of the 5XXX and 6XXX codes is not so crucial.

Currently, the North American Numbering Plan Administrator, at the direction of the Commission, is assigning only one CIC per entity. This conservation mode initially took effect when the assignment of the 969 available three digit CICs reached 700--in March, 1989. Prior to that date, an entity could be assigned three CICs.

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<sup>3</sup> Public Notice, DA 96-678, p. 1, released April 30, 1996.

The meeting record from the Industry Carriers Compatibility Forum (ICCF) # 16, on March 1-2, 1989, indicates that 689 CICs had been assigned. Of that total, 668 had been assigned for domestic use to 505 different entities. The breakdown on CIC assignment was:

<u>Number of CICs</u>	<u># of Entities Assigned That Number of CICs</u>
1	401
2	60
3	37
4	1
5	4
6	2

Seventy-nine percent of the entities held only one code, even when entitled to three. These data indicate that, if the current assignment restrictions were lifted, not every entity would want or need additional codes. Therefore, whether or not the transition period is extended, there is no reason to continue the current restriction on the assignment of CICs.

### III. CONCLUSION

The Commission should end the transition period by no later than December 31, 1996. There have been no persuasive arguments placed on the record which warrant its continuation past that date. This period certainly accommodates the need to educate customers and is much longer than the period normally associated with other dialing changes.

Respectfully submitted,

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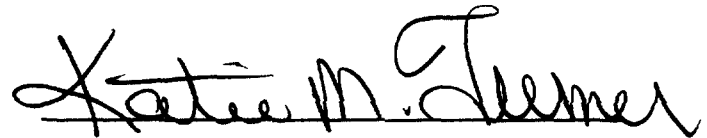
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**CERTIFICATE OF SERVICE**

I, Katie M. Turner, hereby certify that the foregoing, "Comments of SBC Communications Inc." in Docket No. 92-237, Phases One and Two has been filed this 21st day of May, 1996 to the Parties of Record.

A handwritten signature in cursive script, reading "Katie M. Turner". The signature is written in black ink and is positioned above the printed name.

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